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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 13-CR-00508 LHK
)	
v.)	STIPULATION AND [PROPOSED] ORDER
)	CONTINUING STATUS DATE & AMENDING
LAURA GARCIA,)	MINUTE ORDER RE EXCLUSION OF TIME
a/k/a "Blinky," and)	
VANESSA PULIDO,)	
a/k/a "Bunny,")	
)	
Defendants.)	

The government and defendants Laura Garcia and Vanessa Pulido, through their respective counsel, hereby stipulate and request that the status hearing currently set for Wednesday, February 19, 2014, at 9:30 a.m., be continued to Wednesday, March 19, 2014, at 9:30 a.m., before The Honorable Lucy H. Koh, United States District Judge. The reasons for the requested continuance are: the undersigned government counsel inadvertently set the current status date the same week as a scheduled vacation; and the government and one of the parties may explore resolution and possible change of plea on March 19, 2014, for which additional time is necessary.

Additionally, the government noticed a typographical error in the Court's minute order of December 4, 2013 concerning the dates for which the Court excluded time under the Speedy Trial Act. The parties believe the Court intended to order, and orally ordered, that time be excluded from December 4, 2013, through and including the trial date of July 14, 2014. The parties hereby stipulate and request that the Court amend its prior minute order to reflect exclusion of time from December 4, 2013, through and including the trial date of July 14, 2014, as the reasonable time necessary for effective preparation of counsel, such that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv).

Dated: February 10, 2014

MELINDA HAAG

United States Attorney

 /s/
CASEY O'NEILL
Special Assistant United States Attorney

Dated: February 10, 2014

/s/

JAMES MCNAIR THOMPSON
Counsel for defendant Laura Garcia

Dated: February 10, 2014

_____/s/_____
JERRY FONG
Counsel for defendant Vanessa Pulido

~~[PROPOSED]~~ ORDER

Good cause appearing and by stipulation of the parties,

IT IS HEREBY ORDERED that the status hearing currently set for Wednesday, February 19, 2014, at 9:30 a.m., shall be continued to Wednesday, March 19, 2014, at 9:30 a.m.

It is further ordered, based on prior representations of counsel and the Court's oral order of December 4, 2013, that time from December 4, 2013, through and including July 14, 2014, shall be excluded from the computation of the time within which trial shall commence, as the reasonable time necessary for effective preparation of counsel, such that the ends of justice served by the continuance outweigh the best interest of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(4).

Date: 2/11/14

Lucy H. Koh
HON. LUCY H. KOH
United States District Judge

Supplement to Order:

Time is ^{also} excluded because failure to grant the continuance would unreasonably deny the Government continuity of counsel, per 18 USC § 3161(h)(7)(B)(iv) and 3161(h)(7)(A).

Date: 2/11/14

Lucy H. Koh
U.S. District Judge